UNITED STATES GOVERNMENT

## 2- Way Memo

Subject: Draft Warning Letter concerning Union Manufacturing Inc.

Paul D. Blais, T-2-1 โด Env. Prot. Specialist RCRA State Programs Section

Thru: Bob Mandel, T-3-2 Chief, Field Inspection SFUND RECORDS CTR 2384292

INSTRUCT MIS

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RECEIVER (Replier to message): Reply below the message, keep one copy, return one copy.

DATE OF MESSAGE

ROUTING SYMBOL

1/13/83

T - 3 - 2

SIGNATURE OF ORIGINATOR

Karen Lee O'Regan

TITLE OF ORIGINATOR

Env. Prot. Specialist.

MESSAGE

Upon review of the attached warning letter, I recommend that a Compliance Order be issued to the subject facility for the following reasons:

- Failure of the facility to implement a groundwater monitoring system (Compliance Order should be issued per 1/22/82 MacMillan Memorandum).
- Site is unfenced, unmonitored, and accessible to persons or livestock via an unpaved road. Facility is located in an Industrial Park on an Indian Reservation.
- I observed releases of hazardous waste in several locations.
- Damaged containers holding waste in the hazardous waste storage area were open.
- 5. Up to 21 potential violations of RCRA were observed; 8 of which are potential class I.

According to the criteria for determining an imminent and substantial endangerment, this facility appears to qualify. determination was made around 12/30, at which time I verbally relayed it to you.

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From : Karen O'Regan, Field Investigator Field Inspections Section, T-3-2

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**ÚNITED STATES GOVERNMENT** 

2- Way Memo

Subject:

Union Manufacturing Inc.

Phil Bobel

R(83)E006

Chandler, Arizona (Indian Lands)

INSTRUCTIONS

Use routing symbols whenever possible.

SENDER (Originator of message): Use trief, informal language. Conserve space: Forward original and one copy.

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DATE OF MESSAGE

ROUTING SYMBOL

12/29/82

T-3-2

SIGNATURE OF ORIGINATOR

TITLE OF ORIGINATOR

Env. Prot. Specialist

THRU:

THRU:

Kathleen G. Shimmin T-3

Chief, Compliance & Response Branch

T-3-2

Chief, Field Inspections Section

Chief, Toxics & Waste Programs Branch

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MESSAGE

Enclosed for your review and action is a RCRA ISS investigation on the subject facility. An extensive list of potential violations is attached. The amount of waste generated by Union Manufacturing may qualify the facility as a small quantity generator. However, I observed evidence of on-site waste disposal in four locations. These potentially contaminated areas should be addressed by the facility before EPA approves the withdrawal of their Part A application. All waste areas are unfenced, and accessible via an unpaved road. A Potential Hazardous Waste Site Preliminary Assessment for Union Manufacturing Inc. will be completed, and transmitted to T-3-1.

Per a discussion with Paul Blais today, this report will be transmitted to the facility when the transmittal format is finalized by T-2.

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DATE OF REPLY \* ·

SIGNATURE OF REPLIER

Karen O'Regan, T-3-2 Field Investigator Field Inspections Section Compliance & Response Branch

TITLE OF REPLIER

GSA FPMR (41 CFR) 101-11.0 ÑSN 7540-00-082-2447

POLITING SYMBOL

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